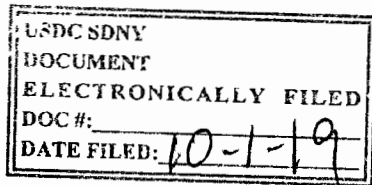


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& Reed**

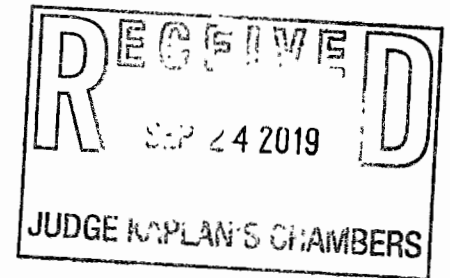


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MEMO ENDORSED

September 19, 2019



BY HAND

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)

Dear Judge Kaplan:

We write on behalf of Plaintiff Skatteforvaltningen, the Customs and Tax Administration of the Kingdom of Denmark ("SKAT"), to notify the Court of an apparent technical error. The docket in this action lists Richard Markowitz twice: once, correctly, as a Defendant represented by Wilmer Cutler Pickering Hale & Dorr LLP; and once, incorrectly, as a Plaintiff *pro se*. We have conferred with counsel for Mr. Markowitz and they have confirmed that the latter listing is erroneous. Accordingly, we respectfully request that the Court direct the Clerk to remove the listing identifying Mr. Markowitz as a Plaintiff *pro se* from the docket.

Respectfully submitted,

Marc A. Weinstein

SO ORDERED
LEWIS A. KAPLAN, USDC
10/1/19
All counsel of record (via email)